

## COVINGTON

BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG  
LONDON LOS ANGELES NEW YORK PALO ALTO  
SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Arlo Devlin-Brown

Covington & Burling LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018-1405  
T +1 212 841 1046  
adevlin-brown@cov.com

Via Electronic Case Filing System

September 8, 2023

Hon. Loretta A. Preska  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Smart Agunbiade*, 21 Cr. 609 (LAP)**

Dear Judge Preska:

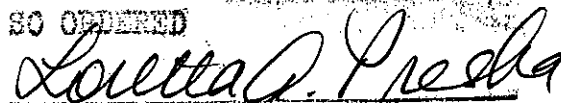
On behalf of Mr. Agunbiade, we write to request an adjournment of Mr. Agunbiade's surrender date, which is currently scheduled for September 15, 2023, to October 16, 2023, and to request that Mr. Agunbiade be permitted to make personal travel to Maryland to be with his one-year-old daughter until his surrender date. The current conditions of his release restrict travel to the Southern and Eastern Districts of New York and the District of New Jersey, and verified business travel to New York, Connecticut, Pennsylvania, Maryland, Delaware and the District of Columbia upon advance notice to and approval of his Pretrial Services Officer.

Mr. Agunbiade is requesting the adjournment and permission to travel to Maryland in order to care for his daughter, who has a medical condition requiring doctor's visits. The child's mother is a traveling nurse, and will be traveling for the next three weeks for work in Florida, and Mr. Agunbiade is needed to provide primary child care for his daughter during this time and before he begins his prison sentence. This requires both a brief adjournment of his surrender date, as well as modification to his conditions of his release to allow travel to Maryland. If the Court approves the request, Mr. Agunbiade will provide his Pretrial Officer with his itinerary.

We have conferred with Pretrial Services and the government. Pretrial Services takes no position on the defendant's travel as long as court approval is given. The government takes no position on the defendant's travel and the requested adjournment.

We thank the Court for its attention to this matter.

Respectfully submitted,

SO ORDERED  
  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

/s/ Arlo Devlin-Brown  
Arlo Devlin-Brown

9/8/23